

IN THE UNITED STATES DISTRICT COURT
UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Richmond Division

STEVES AND SONS, INC.,

Plaintiff,

v.

JELD-WEN, INC.,

Defendant.

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) Civil Action No. 3:16-cv-545-REP
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PLAINTIFF STEVES AND SONS, INC.'S PROPOSED VOIR DIRE QUESTIONS

Plaintiff Steves and Sons, Inc., hereby requests that the Court ask the following voir dire questions:

1. Does any member of the jury panel know any of the lawyers who were introduced to you?

2. Have you or any member of your family ever been represented by any of the lawyers or their law firms in this case?

3. Has any member of the jury panel or your immediate family, either now or in the past, ever been employed by Steves and Sons, Inc.?

4. Has any member of the jury panel or your immediate family, either now or in the past, ever been employed by JELD-WEN, Inc.?

5. Do you or any member of your family know, or have you known, any of the following people, who may be called to testify in this case:

- a. John Ambruz
- b. Martin Cole
- c. Stephen Fancher

- d. Bruce Fedio
- e. Doug Gartner
- f. Kirk Hachigian
- g. Hans Heintel
- h. David Kaplan
- i. Fred Lynch
- j. Brooks Mallard
- k. Gaston Mauvezin
- l. Robert Merril
- m. Jim Morrisson
- n. Anthony Munk
- o. Phillip Orsino
- p. Timothy Pack
- q. John Pierce
- r. Matthew Ross
- s. Carl Shapiro
- t. Edward Snyder
- u. Sam Steves
- v. Edward Steves
- w. Tres Steves
- x. Avram Tucker
- y. Leticia Villarreal
- z. Scott Vining
- aa. Mike Walmsley
- bb. Richard Wendt
- cc. Greg Wysock

6. Has any member of the jury panel, either now or in the past, ever owned a business?

7. Has any member of the jury panel or your immediate family ever worked for a company that was acquired by another company or that acquired another company?

8. Has any member of the jury panel obtained a college degree or higher?

9. Has any member of the jury panel ever been educated, formally or informally, about the United States antitrust laws?

10. Has any member of the jury panel ever written or evaluated contracts in a business setting?

11. Has any member of the jury panel or your immediate family ever been employed

or had training in home construction?

12. Has any member of the jury panel or your immediate family ever been employed or had training in the manufacture, distribution, installation or sale of residential interior doors?

13. Has any member of the jury panel or your immediate family ever been employed by a hardware or home improvement store?

14. Has any member of the jury panel or your immediate family ever been employed by a company that is or was involved in the manufacturing or sale of doorskins?

15. Has any member of the jury panel or your immediate family ever been employed by a company that makes equipment that is involved in the manufacturing of doorskins?

16. Has any member of the jury panel or your immediate family ever been employed by a company that is or was involved in the manufacturing or sale of medium density fiberboard?

17. Has any member of the jury panel or your immediate family ever been involved in buying or selling a business?

18. Has any member of the jury panel or your immediate family ever been involved in a lawsuit involving antitrust laws, either as a plaintiff or defendant?

19. Has any member of the jury panel or your immediate family ever been accused of failing to live up to a contract or agreement?

20. Has any member of the jury panel or your immediate family ever been involved in a lawsuit involving an alleged breach of contract, either as a plaintiff or defendant?

21. Has any member of the jury panel or your immediate family ever been involved in a lawsuit or any kind, either as a plaintiff or defendant?

22. Do you generally oppose laws that seek to regulate competition between companies?

23. Do you generally support laws that promote competition between companies?
24. Do any of you have opinions about the civil justice system that lead you to feel one way or the other about lawsuits between companies?
25. Do any of you believe that companies that are involved in disputes should not use the court system to resolve those disputes?
26. Has any member of the jury panel or your immediate family ever been employed by the United States government, including the United States Department of Justice?
27. Have you or any member of your immediate family ever served on a jury?
28. It is possible that this case will take two weeks or longer to complete. Is there any member of the jury panel who has a specific hardship that would make it impossible to commit this amount of time?
29. Does any member of the jury panel have any special physical disability or problem that would make it difficult or impossible for you to serve as a juror?
30. Is there anything about yourself that you think we should know to help us decide whether you will be an appropriate juror in this case?

Dated: January 19, 2018

Respectfully submitted,

By: /s/Lewis F. Powell III
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Of Counsel

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2018, I caused a copy of the foregoing to be electronically filed using the CM/ECF system, which will send notification to counsel of record of such filing by operation of the Court's electronic system. Parties may access this filing via the Court's electronic system.

By /s/Lewis F. Powell III
Lewis F. Powell III